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BY ECF

Hon. Frederic Block
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Lanni, et. al., 23 Cr. 443 (FB)

Dear Judge Block:

We represent Vito Rappa in the above-referenced indictment. We write jointly on behalf of all defendants to request that the current motion schedule be modified to permit Defendants to file their motions by May 2, 2025, rather than February 28, 2025 as currently scheduled.

Among other things, our request is based on the substitution of counsel for defendant Diego Tantillo, which we expect to occur later today, and the fact that Mr. Tantillo's previous counsel had represented that he would be handling a significant portion of the motions, for which other defendants would be joining. Substitution of counsel has delayed that process and new counsel will need some time to be in a position to file such motions.

We have conferred with the government who do not object to our request for a modification of the motion schedule.

If the court grants our request, the modified motion schedule would be:

Defense motions filed by May 2, 2025;

Government response filed by July 2, 2025;

Defense reply motions filed by August 2, 2025.

Thank you for your attention to this matter.

Very truly yours,

/s/

Wayne E. Gosnell, Jr.